



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 22, 2008

Royce Kemp
Mayport Homeporting EIS Project Manager
Naval Facilities Engineering Command, Southeast
Building 903
Naval Air Station Jacksonville, Florida 32212-0030

SUBJECT: Final Environmental Impact Statement for the Proposed Homeporting of
Additional Surface Ships at Naval Station Mayport, Duval County, Florida;
CEQ Number 20080473

Dear Mr. Kemp:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The U.S. Department of the Navy (Navy) proposes to homeport various types of surface ships, including the reassignment of operational staff, dependents, and other personnel to Naval Station (NAVSTA) Mayport, Duval County, Florida.

Thirteen alternatives were considered in the Final EIS, including the no action alternative. The no action alternative represents no proposed additional homeporting and also includes the decommissioning of several surface ships currently homeported at NAVSTA Mayport. The 12 action alternatives incorporate homeporting various types and numbers of ships, including: cruisers, destroyers, frigates, amphibious assault ships, amphibious transport dock ships, dock landing ships, and a nuclear powered aircraft carrier (CVN). Depending on the specific alternative, this could involve a considerable amount of new work dredging and disposal of dredged material, maintenance facilities improvements, utilities upgrades, wharf improvements, personnel support improvements, parking facilities and traffic improvements, or construction of nuclear propulsion plant maintenance facilities.

Alternative 4 was identified as the preferred alternative in the Final EIS, which involves homeporting one CVN, dredging, infrastructure and wharf improvements, and construction of CVN nuclear propulsion plant maintenance facilities. Due to the decommissioning of an older aircraft carrier and ten frigates currently homeported at NAVSTA Mayport, implementation of the preferred alternative would ultimately result in a decrease in the net daily population at NAVSTA Mayport as compared to baseline conditions in 2006.

To accommodate one CVN, the NAVSTA Mayport turning basin, entrance channel and the Jacksonville Harbor Bar Cut federal navigation channel would require dredging to a depth of

– 50 feet (ft) Mean Lower Low Water (MLLW). The actual project deepening is proposed to be – 50 ft MLLW, plus – 2 ft of advance maintenance (in portions of the project), plus – 2 ft of allowable overdepth for a total depth of – 54 ft MLLW. This proposed deepening would involve the excavation of an estimated 5.2 million cubic yards (cy) of dredged material. The dredging project could be implemented as early as 2011 and occur over the course of 12 to 18 months. Dredging operations typically occur continuously, up to 24 hours per day, seven days per week. The Navy proposes to dispose of the dredged material from the deepening project at two ocean dredged material disposal sites (ODMDS) managed by EPA in cooperation with the U.S. Army Corps of Engineers (USACE). In the event that any dredged material does not meet EPA criteria (40 CFR 227) for ocean disposal, it would be disposed of at existing permitted upland disposal sites.

EPA's primary concerns raised in the review of the Draft EIS were the extent of dredged material proposed as part of advance maintenance dredging and concerns about onshore facility construction practices and impacts. EPA asked for additional information related to the need for advance maintenance dredging in specific areas. EPA appreciates the response to our comments and the additional hydrodynamic modeling that the Navy conducted to identify areas that would not require advance maintenance. This additional modeling resulted in a reduction of 500,000 cy of dredged material for ocean disposal. EPA also appreciates the additional responses to our comments related to air quality, water quality, and potential traffic impacts. As was described in the Final EIS, EPA strongly recommends that the Navy consider the conversion of the current base shuttle service to low emission vehicles in 2009/2010 and continue to replace fleet vehicles with hybrid and other alternative-fueled vehicles to minimize long-term air quality impacts. We are also pleased to note the Navy's commitment to implement Low Impact Development practices as part of new building construction.

EPA offers a few additional comments from our review of the Final EIS, primarily related to the Marine Protection, Research, and Sanctuaries Act (MPRSA) Section 103 permitting process:

Dredged Material Disposal – Jacksonville ODMDS

The Final EIS proposes to dispose of two million cy of dredged material at the Jacksonville ODMDS with the remainder of the material going to the Fernandina Beach ODMDS. Based on a capacity study analysis conducted by the USACE in consultation with EPA, we agree that disposal of two million cy of material can occur without exceeding the capacity of the Jacksonville ODMDS. However, it is estimated that the remaining capacity will only be sufficient to support continued maintenance dredging of NAVSTA Mayport and the Jacksonville Federal Navigation Channel for seven to nine years. As a result, special management practices will likely have to be enacted. Prior to approval for disposal of this quantity of material at the Jacksonville ODMDS, the following actions will have to be undertaken:

- The Jacksonville ODMDS Site Management and Monitoring Plan (SMMP) will have to be modified to increase the annual limit on the volume of dredged material that can be

disposed and to increase the size of the disposal release zone consistent with parameters in the capacity study. EPA recommends modification of the SMMP as part of the MPRSA Section 103 permitting process.

- The Long-Term FATE modeling will have to be completed by the USACE or the Navy consistent with the recommendations in the capacity study. This will need to be completed prior to any modification to the SMMP.

In addition to the above requirements, EPA offers the following recommendations that should be addressed during the permitting process:

- The finer material from the turning basin should be disposed at the Jacksonville ODMDS rather than the Fernandina Beach ODMDS since it has a less adverse effect on capacity.
- A bathymetry survey of the Jacksonville ODMDS should be conducted following disposal of the first one million cubic yards to determine if any modification of disposal operations is warranted.

Due to the limited remaining capacity of the Jacksonville ODMDS, we expect the USACE, in cooperation with the Navy, to initiate the process for either expanding the existing Jacksonville ODMDS or designate a new or additional Jacksonville ODMDS. This process is explained in the EPA Region 4 and USACE South Atlantic Division Memorandum of Understanding on Dredged Material Disposal. Failure to do so could leave the Navy and the USACE without an ocean disposal alternative in the vicinity of Jacksonville, Florida.

Dredged Material Disposal – Fernandina Beach ODMDS

The Final EIS proposes that 3.2 million cubic yards of material be disposed at the Fernandina Beach ODMDS. The Fernandina Beach ODMDS SMMP requires that for projects greater than 950,000 cubic yards, modeling be conducted to determine an appropriate buffer to contain the initial disposal mound within the ODMDS boundaries. Modeling results included with the Final EIS demonstrate that the existing buffer (1,500 feet) is adequate to contain the initial disposal mound within the boundaries. The Fernandina Beach ODMDS SMMP expires in December 2008 and will require review and revision prior to permitting of disposal of dredged material from this project. EPA expects the Navy to be an active participant in the review and revision of the Fernandina Beach ODMDS SMMP.

Radiological Environmental Monitoring Program

Section 5.4.4 of the Final EIS describes comprehensive radiological environmental monitoring conducted by the Navy in harbors frequented by its nuclear-powered ships. It is unclear from the EIS if this program will be implemented as described at NAVSTA Mayport. EPA recommends that the Navy include this important monitoring program as a specific commitment in the Record of Decision for this project to provide assurance that procedures used by the Navy to control radioactivity are adequate to protect the environment. EPA requests that results from the quarterly sediment monitoring be supplied to the USACE and EPA and included as part of the routine dredged material evaluations. If any increases in the background

concentrations are detected, further evaluation will be required prior to dredging and disposal in the ocean.

Based on changes to the project (i.e., reduction in dredging volumes), a commitment to address our concerns related to dredged material disposal during the MPRSA Section 103 permitting process, and the additional mitigation measures and monitoring programs described in the Final EIS, EPA has no additional concerns related to this project. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Steve Ross – USACE Jacksonville District